

1 QUIN DENVER, Bar #49374
2 Federal Defender
3 DENNIS S. WAKS, Bar #142581
Supervising Assistant Federal Defender
3 801 I Street, 3rd Floor
Sacramento, California 95814
4 Telephone: (916) 498-5700

5 Attorney for Defendant
6 CARRIE MARIE SULAK

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

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12 UNITED STATES OF AMERICA,) No. CR.S-04-0218 MCE
13 Plaintiff,)
14 v.)
15 CARRIE MARIE SULAK, et al.) Date: October 4, 2005
16 Defendants.) Time: 8:30 a.m.
17) Judge: Hon. Morrison C. England
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20 It is hereby stipulated and agreed to between the United States of
21 America though Phil Ferrari, Assistant U.S. Attorney; defendant, CARRIE
22 MARIE SULAK, by and through her counsel, Dennis S. Waks, Supervising
23 Assistant Federal Defender; and defendant, JOSEPH W. MCALLISTER, by and
24 through his counsel, William J. Portanova, that the status conference
25 of August 30, 2005 be vacated and a further status conference be set
26 for October 4, 2005 at 8:30 a.m.

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1 This continuance is being requested because defense counsel
2 requires additional time to obtain discovery, continue our
3 investigation, and to interview our clients and other witnesses.
4 Furthermore, the parties are negotiating a plea agreement and need time
5 to reduce it to writing and provide it to the Court. Both Defense
6 counsel need time to discuss the plea with the prosecutor and with the
7 defendants.

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Speedy trial time is to be excluded from the date of this order through the date of the status conference set for October 4, 2005, pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv) and Local Code T4 based upon continuity of counsel and defense preparation.

Dated: August 25, 2005

Respectfully submitted,

QUIN DENVIR
Federal Defender

/s/ Dennis S. Waks

DENNIS S. WAKS
Supervising Assistant Federal
Defender
Attorney for Defendant
CARRIE MARIE SULAK

/s/ Dennis S. Waks for

WILLIAM J. PORTANOVA
Attorney for Defendant
JOSEPH W. MCALLISTER

Dated: August 25, 2005

MCGREGOR W. SCOTT
United States Attorney

/s/ Dennis S. Waks for

PHIL FERRARI
Assistant U.S. Attorney

O R D E R

IT IS SO ORDERED.

Dated: August 30, 2005

Merton C. England, Jr.

MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE